

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA

Plaintiff

v.

TOMAS HAILEMARIAM

Defendant.

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CASE NO. 2:22-CR-109

JUDGE MORRISON

DEFENDANT TOMAS HAILEMARIAM DISCOVERY DISCLOSURE

Now comes Defendant, Tomas Hailemariam, by and through counsel, hereby provides the following Discovery Disclosure pursuant to Rule 16(b)(1) of the Federal Rules of Criminal Procedure as follows:

A. Documents and Objects – The Defendant states that he has no documents or objects, including photograph books, papers, documents, data, photographs, tangible objects, buildings or places, or copies thereof, available to or within the possession or control of Defendant which he intends to introduce into evidence at trial. Defendant reserves the right to use any documents and objects provided to him by the Government in discovery.

B. Reports of Examinations and Tests – The Defendant states that he has no results or reports of any physical or mental examination or of any scientific test or experiment available to or within the possession or control of Defendant which he intends to introduce into evidence at trial. Defendant reserves the right to use any reports of examinations and tests provided to him by the Government in discovery.

C. Expert Witnesses – The Defendant has no written summary of any

testimony that the Defendant intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence. Defendant reserves the right to use any written summary of any testimony the Government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence provided to him by the Government in discovery.

Pursuant to Rule 16(c) of the Federal Rules of Criminal Procedure, should Defendant discover additional evidence or material before or during trial, Defendant will disclose its existence to the Government so long as the evidence or material is subject to discovery or inspection pursuant to Rule 16 of the Federal Rules of Criminal Procedure. Defendant reserves the right to introduce any and all discovery provided to him by the Government.

Respectfully submitted,

/s/ Dustin M. Blake

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Attorney for Defendant Tomas Hailemariam

CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing was electronically served upon the Assistant United States Attorney, United States Attorney's Office, 303 Marconi Blvd., Suite 200, Columbus, Ohio 43215, on this June 27, 22.

/s/ Dustin M. Blake
Dustin M. Blake (0080560)